

respective depositions including depositions of the Plaintiffs tentatively scheduled to be conducted on May 13, 2019, deposition of the corporate representative of RoundPoint and Embrace to be conducted on May 16, 2019, and deposition of the corporate representative of LoanCare to be conducted on May 21, 2019. The Parties believe that they will be able to complete remaining factual depositions, if any, by the proposed new factual discovery deadline of June 21, 2019.

4. The proposed continuance addresses the concerns discussed during the discovery conference with the Court on April 8, 2019.

5. The proposed extension will not delay the proceeding including, but not limited to, the summary judgment deadlines and/or the trial date.

6. The requested extension will conform to the requirements of Local Rule 16.01(d)(2.f).

7. A proposed, revised case management order setting forth the new proposed deadline and all prior, unaffected deadlines has been attached as Exhibit A and has been approved in full for entry by the Parties.

ENTERED This 26th day of April, 2019.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been forwarded to the following, by regular U.S. Mail or email where appropriate, on this 26th day of April, 2019:

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